

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

R.S. BASSMAN, Derivatively on Behalf of FREDDIE
MAC a/k/a Federal Home Loan Mortgage Corporation
and its shareholders,

Plaintiff,

v.

RICHARD F. SYRON, PATRICIA L. COOK,
ANTHONY S. PISZEL, EUGENE M. McQUADE,
RICHARD KARL GOELTZ, STEPHEN A. ROSS,
SHAUN F. O'MALLEY, ROBERT R. GLAUBER,
BARBARA T. ALEXANDER, WILLIAM M.
LEWIS, JR., JEFFREY M. PEEK, GEOFFREY T.
BOISI, RONALD F. POE, WASHINGTON
MUTUAL, INC., PRICEWATERHOUSECOOPERS,
LLP, KERRY K. KILLINGER, ANTHONY R.
MERLO, JR., FIRST AMERICAN CORPORATION,
FIRST AMERICAN EAPPRAISEIT,
COUNTRYWIDE FINANCIAL CORPORATION,
COUNTRYWIDE HOME EQUITY LOAN TRUST,
COUNTRY-WIDE BANK, FSB, COUNTRYWIDE
HOME LOANS, INC., LANDSAFE, INC., and
ANGELO R. MOZILO

Defendants,

and

FREDDIE MAC a/k/a Federal Home Loan Mortgage
Corporation,

Nominal Defendant.

ECF CASE

Case No. 08-CV-02423 (BSJ) (JCF)

**NOTICE OF ASSENTED-TO
MOTION FOR ADMISSION
PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the Affidavit of Jeffrey A. Simes, submitted
herewith, the undersigned respectfully moves this Court for an Order pursuant to Rule 1.3(c) of
the Local Rules of this Court, admitting Brian E. Pastuszewski, Esq., Stuart M. Glass, Esq., and
Stacey S. Baron, Esq. *pro hac vice* to the Bar of this Court for the purpose of representing
Defendants Countrywide Financial Corporation, Countrywide Home Equity Loan Trust.

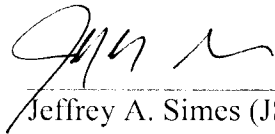
Countrywide Bank, FSB, Countrywide Home Loans, Inc., Landsafe, Inc., and Angelo R. Mozilo, in the above-captioned proceeding. The plaintiff has assented to the relief requested in this motion.

Dated: June 24, 2008

Respectfully submitted,

**COUNTRYWIDE FINANCIAL
CORPORATION, COUNTRYWIDE HOME
EQUITY LOAN TRUST, COUNTRYWIDE
BANK FSB, COUNTRYWIDE HOME
LOANS, INC., LANDSAFE, INC., and
ANGELO R. MOZILO**

By their attorneys,



Jeffrey A. Simes (JS-7060)
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GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
Tel. (212) 813-8800

Brian E. Pastuszewski
bpastuszewski@goodwinprocter.com
Stuart M. Glass
sglass@goodwinprocter.com
Stacey S. Baron
sbaron@goodwinprocter.com
GOODWIN PROCTER LLP
53 State Street
Boston, MA 02110
Tel. (617) 570-1000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

R.S. BASSMAN, Derivatively on Behalf of FREDDIE) ECF CASE
MAC a/k/a Federal Home Loan Mortgage Corporation)
and its shareholders,)
)
Plaintiff,)
) Case No. 08-CV-02423 (BSJ) (JCF)
v.)
)
RICHARD F. SYRON, PATRICIA L. COOK,)
ANTHONY S. PISZEL, EUGENE M. McQUADE,)
RICHARD KARL GOELTZ, STEPHEN A. ROSS,)
SHAUN F. O'MALLEY, ROBERT R. GLAUBER,)
BARBARA T. ALEXANDER, WILLIAM M. LEWIS,)
JR., JEFFREY M. PEEK, GEOFFREY T. BOISI,)
RONALD F. POE, WASHINGTON MUTUAL, INC.,)
PRICewaterhouseCOOPERS, LLP, KERRY K.)
KILLINGER, ANTHONY R. MERLO, JR., FIRST)
AMERICAN CORPORATION, FIRST AMERICAN) **AFFIDAVIT OF SERVICE**
EAPPRAISEIT, COUNTRYWIDE FINANCIAL)
CORPORATION, COUNTRYWIDE HOME)
EQUITY LOAN TRUST, COUNTRY-WIDE BANK,)
FSB, COUNTRYWIDE HOME LOANS, INC.,)
LANDSAFE, INC., and ANGELO R. MOZILO)
)
Defendants,)
)
and)
FREDDIE MAC a/k/a Federal Home Loan Mortgage)
Corporation,)
)
Nominal Defendant.)
)

STATE OF NEW YORK)
ss.:)
COUNTY OF NEW YORK)

Alexis D. Fernandez, being duly sworn, deposes and says that he is not a party to the within action, is over 21 years of age and resides in New York, New York.

That on the 24th day of June, 2008, deponent caused the annexed Notice of Assented-To Motion for Admission Pro Hac Vice, to be served by first class mail, postage prepaid, by

depositing true copies of the same securely enclosed in postpaid wrappers, directed to the following counsel of record:

Daniel P. Chiplock
Steven E. Fineman
Lieff, Cabraser, Heimann
& Bernstein, LLP
780 Third Avenue, 48th Floor
New York, New York 10017

David W. Stanley
Jonathan W. Cuneo
Cueno, Waldman & Gilbert, LLP
507 C Street, NE
Washington, DC 20002

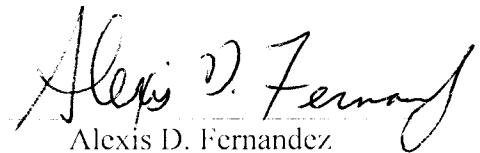
Richard D. Greenfield
Greenfield & Goodman, LLC
780 Third Avenue
New York, NY 10017

Robert J. Cynkar
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, DC 20002

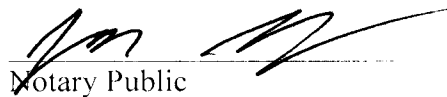
Diana L. Weiss
Joshua M. Cutler
Orrick, Herrington & Sutcliffe,
LLP
Columbia Center
1152 15th Street, N.W.
Washington, DC 20005

Patrick J. Smith
Richard F. Hans, Jr.
Thacher Proffitt & Wood, LLP
Two World Financial Center
New York, NY 10281

Kenneth I. Scacter
Bingham McCutchen LLP
399 Park Avenue
New York, NY 10022


Alexis D. Fernandez

Sworn to before me this
27 day of June, 2008.


Notary Public

JACK GROARKE
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01GR6174713
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES 09/24/2011

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff,

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RICHARD F. SYRON, PATRICIA L. COOK,
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COUNTRY-WIDE BANK, FSB, COUNTRYWIDE
HOME LOANS, INC., LANDSAFE, INC., and
ANGELO R. MOZILO

Defendants,

and

FREDDIE MAC a/k/a Federal Home Loan Mortgage
Corporation,

Nominal Defendant.

ECF CASE

Case No. 08-CV-02423 (BSJ) (JCF

**AFFIDAVIT OF JEFFREY A.
SIMES IN SUPPORT OF
ASSENTED-TO MOTION FOR
ADMISSION *PRO HAC VICE***

STATE OF NEW YORK)
) SS.
COUNTY OF NEW YORK)

Jeffrey A. Simes, being duly sworn, deposes and says:

1. I am a partner with the firm of Goodwin Procter LLP, attorneys for Defendants
Countrywide Financial Corporation, Countrywide Home Equity Loan Trust, Countrywide Bank,

FSB, Landsafe, Inc., and Angelo R. Mozilo in the above-captioned proceeding and a member in good standing of the Bar of this Court since 1997. I make this Affidavit In Support of the Motion, pursuant to Rule 1.3(c) of the Local Rules of this Court, for admission of Brian E. Pastuszewski, Esq., Stuart M. Glass, Esq., and Stacey S. Baron, Esq. to the Bar of this Court *pro hac vice*.

2. Mr. Pastuszewski is a partner with the firm of Goodwin Procter LLP, Exchange Place, 53 State Street, Boston, MA 02109. He is a member in good standing of the Bar of the Commonwealth of Massachusetts. Mr. Pastuszewski is also admitted to practice in the United States Supreme Court, the United States Court of Appeals for the First Circuit, the United States District Courts for the Districts of Massachusetts, Colorado, and Michigan (Eastern District), the United States Tax Court and the United States Bankruptcy Court for the District of Massachusetts. Attached hereto as Exhibit 1 is a Certificate from the Supreme Judicial Court of the Commonwealth of Massachusetts stating that Mr. Pastuszewski is a member in good standing of the Bar of the Commonwealth of Massachusetts. Mr. Pastuszewski is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Rules of this Court.

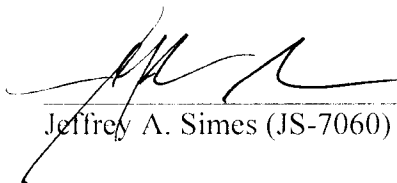
3. Mr. Glass is a partner with the firm of Goodwin Procter LLP, Exchange Place, 53 State Street, Boston, MA 02109. He is a member in good standing of the Bar of the Commonwealth of Massachusetts. Mr. Glass is also admitted to practice in the United States Courts of Appeals for the First and Second Circuits, and the United States District Courts for the Districts of Massachusetts and Colorado. Attached hereto as Exhibit 2 is a Certificate from the Supreme Judicial Court of the Commonwealth of Massachusetts stating that Mr. Glass is a member in good standing of the Bar of the Commonwealth of Massachusetts. Mr. Glass is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Rules

of this Court.

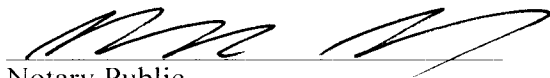
4. Ms. Baron is an associate with the firm of Goodwin Procter LLP, Exchange Place, 53 State Street, Boston, MA 02109. She is a member in good standing of the Bar of the Commonwealth of Massachusetts. Ms. Baron is also admitted to practice in the United States District Court for the District of Massachusetts. Attached hereto as Exhibit 3 is a Certificate from the Supreme Judicial Court of the Commonwealth of Massachusetts stating that Ms. Baron is a member in good standing of the Bar of the Commonwealth of Massachusetts. Ms. Baron is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Rules of this Court.

5. Plaintiff has assented to this motion.

6. Accordingly, I respectfully request that Messrs. Pastuszewski and Glass and Ms. Baron be admitted to the Bar of this Court *pro hac vice* for the purposes of representing Defendants Countrywide Financial Corporation, Countrywide Home Equity Loan Trust, Countrywide Bank, FSB, Countrywide Home Loans, Inc., Landsafe, Inc., and Angelo R. Mozilo in the above-captioned proceeding.


Jeffrey A. Simes (JS-7060)

Sworn to before me this 21 day
of June, 2008.


Notary Public
My Commission expires:

JACK GROARKE
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01166174713
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES 02/24/2011

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **eighteenth** day of **December** A.D. **1981**, said Court being the highest Court of Record in said Commonwealth:

Brian E. Pastuszewski

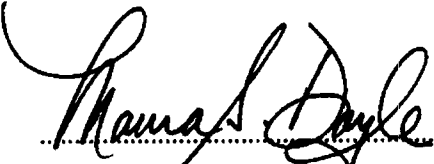
being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **eighteenth** day of **June**

in the year of our Lord **two thousand and eight**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the fourteenth day of December A.D. 1998, said Court being the highest Court of Record in said Commonwealth:

Stuart Marc Glass

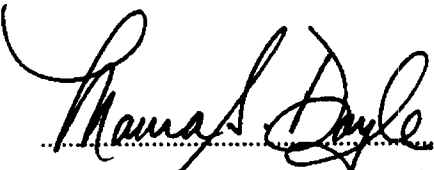
being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this eighteenth day of June

in the year of our Lord two thousand and eight.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **twenty-eighth** day of **November** A.D. **2005**, said Court being the highest Court of Record in said Commonwealth:

Stacey S. Baron

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **eighteenth** day of **June**

in the year of our Lord **two thousand and eight**.



Maura S. Doyle
MAURA S. DOYLE, Clerk

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ANGELO R. MOZILO

Defendants,

and

FREDDIE MAC a/k/a Federal Home Loan Mortgage
Corporation,

Nominal Defendant.

ECF CASE

Case No. 08-CV-02423 (BSJ) (JCF

**[PROPOSED] ORDER
ADMITTING COUNSEL *PRO*
*HAC VICE***

Upon consideration of the Assented-To Notice of Motion for Admission *Pro Hac Vice* of
Brian E. Pastuszewski, Esq., Stuart M. Glass, Esq., and Stacey S. Baron, Esq., dated June 19,
2008, and the accompanying Affidavit of Jeffrey A. Simes, Esq., sworn to on June 19, 2008, it is
hereby:

ORDERED that, pursuant to Local Civil Rule 1.3(c) of the Local Rules of this Court,

Brian E. Pastuszewski, Esq., Stuart M. Glass, Esq., and Stacey S. Baron, Esq. are hereby admitted *pro hac vice* to the Bar of this Court for the purpose of representing Defendants Countrywide Financial Corporation, Countrywide Home Equity Loan Trust, Countrywide Bank, FSB, Countrywide Home Loans, Inc., Landsafe, Inc., and Angelo R. Mozilo in the above-captioned proceeding.

James C. Francis,
United States Magistrate Judge

Dated: _____, 2008